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# FIRE DEPARTMENT

250 LIVINGSTON STREET BROOKLYN, N.Y. 11201-5884

BUREAU OF FIRE COMMUNICATIONS

Before The  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

Replacement of Part 90 by  
Part 88 to Revise the Private  
Land Mobile Radio Services and  
Modify the Policies Governing Them

PR Docket 92-235

TO: The Commission

The New York City Fire Department is compelled to respond to certain sections of PR Docket No. 92-235. Initially, however, we wish to introduce the Commission to the scope of our operations.

The New York City Fire Department is the country's largest urban fire department comprising over 11,000 uniformed firefighters and fire officers, and over 1,000 civilians. The Department is organized into 12 commands, 49 Battalions, 208 engine companies and 142 ladder companies. There are numerous specialty units such as: Decontamination, Foam Apparatus, Thawing Apparatus, Collapse, Mobile Medical, Salvage, Brush Fire, Rescue, Technical Response, Hazardous Material, Safety, Field Communication, Tactical Support, Mask Service, Marine (fireboat) and Fire Investigation. Fire Operations cover the entire 5 borough region of New York City. As an indication of the volume of fire traffic processed, in 1992 the Department handled 862,095 calls of which approximately 450,000 were alarms responded to. Total fires for that year were approximately 97,000. As an indication of equipment quantity in service, the Department operates in VHF 4050 mobile stations. 14

Transmissions operate at necessary ERP values, as currently licensed, in order to cover the entire City from each site, which is an operational necessity. Command Chiefs and operational units located anywhere within the City must be able to monitor and communicate with any borough. These communications are required given the complex mix of terrain of New York City, which comprises high rise structures, low rise structures and areas of foliage, flat or hilly.

Our radio dispatch network is a simple and basic configuration that provides reliable coverage. The exception to the system's excellent performance is the interference that the aforementioned two boroughs experience by virtue of sharing the same channel. Currently, minimal hardware installations are required to cover the 309 square mile City; therefore, capital costs for equipment upgrading or replacement are now minimal. Maintenance and repair of the system is performed by our own Radio Repair Shop, and because of the reliable and efficient hardware configuration, expense costs are also held to a minimum.

However, to require the New York City Fire Department to completely redesign and equip a recently replaced and upgraded VHF radio dispatch system is untenable in view of the associated logistical complexity of such a change and exorbitant cost to the City to comply with the proposed goals of ERP/HAAT requirements. To comply, we would have to implement along the following lines:

- \* A new system must be designed through the use of a consulting service.
- \* A long term capital program would be required to implement a new system.
- \* A multitude of additional sites to provide the required coverage at reduced power levels at specific HAAT elevations would be required. Acceptable additional sites are very difficult to obtain in New York City.
- \* Site pairs and triplets (or more) must be simulcast for each borough channel to provide citywide coverage for each borough.
- \* The Fire Department's one command channel, "Citywide," must be similarly simulcast through the use of numerous sites.

The combination of a multitude of sites, a multitude of transmitters and associated radio infrastructure, excessive simulcasting with its microwave linkage requirements, and probable need for additional channels to achieve a functional design would render what is now an extremely simple and basic system to a needless nightmare of expensive complexity and unreliability.

Regarding the expense alone of a new VHF radio dispatch network, it appears extremely wasteful for the following reasons:

- \* A capital estimate is \$10 million for installing a replacement infrastructure (fixed equipment) system.
- \* This cost must be born during times of reduced tax revenues and resulting extreme City budget stringencies.

In summary of this issue, we believe that existing public safety entities such as the New York City Fire Department, which could meet the intent of the ERP/HAAT requirement of the docket only under extreme hardship and expense, should be exempted from the proposed requirement.

Second, we take exception to the specific cost implication that scheduled refarming under PR Docket 92-235 imposes. The proposal mandates that by January 1, 2004, the final changeover date, our entire system, infrastructure and mobile equipment, must be replaced with 5 KHz bandwidth compatible equipment. It is our understanding that the initial changeover may be moved forward to the 1996 time frame requiring 12.5 KHz bandwidth compatible equipment.

Since we have just completed replacement and upgrading of our entire VHF infrastructure system in 1992, another early expenditure for system redesign and replacement would be wasteful to another level. Insufficient time has elapsed to amortize the cost of the present new equipment. Due to inherent equipment quality and reliability, our replacement life cycles run well beyond ten years and close to 20 years. Therefore, a redesign and replacement after only several years is wasteful by any economic standard.

The abovementioned mandate includes not only infrastructure, which is the subject of the ERP/HAAT discussion, but also all mobile equipment. The latter replacement would add an estimate of \$15 Million to the conversion cost, for a total estimated cost of \$25 Million. These costs, in large part, would be incurred again to accommodate the final change in 2004.

In summary of this issue, we request that the timetable for mandatory compliance of equipment replacement to reduced bandwidth be extended to permit at least ten years of existing equipment life from the date of adoption of the new Part 88.

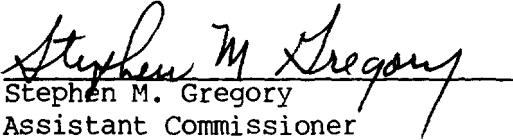
Third, the Fire Department's Bureau of Fire Investigation (Fire Marshals) operates a UHF radio communications system with its main transmitter located on top of the World Trade Center. This transmitter at 348 watts ERP, as currently licensed, covers Citywide and local operations of the Fire Marshals. Under the proposed ERP/HAAT requirement, this transmitter would be forced to operate at 5 watts ERP, effectively destroying the use of this system. Although this UHF radio system is smaller in scope than the VHF radio dispatch network heretofore described, similar comments with respect to required system redesign, replacement and maintenance can be presented.

We strongly request that the FCC reevaluate PR Docket 92-235 in light of the impact on the operations of public safety systems such as that of the New York City Fire Department. We trust that a workable and practical Part 88 can be developed. If we need to answer any questions or supply any additional information, please contact the undersigned.

We thank you for your consideration of this petition.

COMMENTS OF NEW THE YORK CITY FIRE DEPARTMENT

Respectfully submitted,

  
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May 4, 1993  
GPC:ys